

January 14, 2015

Ms. Rebecca Chu
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, AWT-121
Seattle, Washington 98101

BY E-MAIL ONLY

**RE: MONTHLY PROGRESS REPORT – DECEMBER 2014
JORGENSEN FORGE EARLY ACTION AREA – REMOVAL ACTION
IMPLEMENTATION
U.S. EPA DOCKET NO. CERCLA-10-2013-0032
SEATTLE, WASHINGTON
FARALLON PN: 831-032**

Dear Ms. Chu:

Farallon Consulting, L.L.C. (Farallon) has prepared this monthly progress report on behalf of Earle M. Jorgensen Company (EMJ) to document the activities conducted during December 2014 at the Lower Duwamish Waterway Superfund Site Jorgensen Forge Early Action Area (Site) in Seattle, Washington. This monthly progress report was prepared in accordance with the requirements of the Administrative Settlement Agreement and Order of Consent (AOC) for Removal Action Implementation at the Site issued by U.S. Environmental Protection Agency (EPA) Region 10 on November 5, 2012 under EPA Docket No. CERCLA-10-2013-0032. To date, approximately 75 percent of the required work is complete.

EMJ received written notice from EPA on November 25, 2014 that EMJ is in non-compliance with the AOC for the performance of the Non-Time Critical Removal Action of contaminated sediments and associated shoreline bank soils at the Site. On December 9, 2014, EMJ issued a written notice of objection and requested Dispute Resolution under the provisions of the AOC. The initial "Negotiation Period" under Section XVI of the AOC ends on February 2, 2015. EMJ and EPA held a technical meeting on January 8, 2015 to discuss the technical issues identified in the written notices. EMJ is in the process of preparing additional information for submittal to EPA to demonstrate remedy protectiveness and that the surface sediment z-layer sampling total polychlorinated biphenyl (PCB) concentrations represent residuals settlement on the post-dredge surface, not in-situ sediments exceeding the total PCB removal action level. EPA is the process of providing EMJ additional guidance regarding their request for sampling and analysis of sediments underlying the placed clean backfill material, including sampling objectives, data interpretation, and use.

This monthly progress report provides:

- A summary of field activities conducted during December 2014;



- Analytical results for samples collected during December 2014;
- A summary of deliverables submitted and received during December 2014;
- A summary of technical and regulatory meetings during December 2014;
- A summary of planned activities, meetings, and deliverables for January and February 2015; and
- A summary of deviations from the AOC schedule anticipated for January and February 2015.

FIELD ACTIVITIES – DECEMBER 2014

No field activities occurred during December 2014.

ANALYTICAL RESULTS – DECEMBER 2014

No laboratory analytical results were obtained in December 2014.

DELIVERABLES – DECEMBER 2014

- Monthly Progress Report for November 2014 was submitted to EPA on December 14, 2014.
- Received EPA Disapproval of the Jorgensen Forge Early Action Area Removal Pre-Final Certification Inspection Letter Report on December 12, 2014.

TECHNICAL AND REGULATORY MEETINGS – DECEMBER 2014

In accordance with the Memorandum of Understanding between EMJ, Jorgensen Forge, and The Boeing Company (Boeing), the parties participated in a coordination meeting on December 8, 2014.

PLANNED ACTIVITIES, MEETINGS, AND DELIVERABLES – JANUARY AND FEBRUARY 2015

Activities

As discussed herein, EMJ is in the process of preparing additional information for submittal to EPA to demonstrate remedy protectiveness and that the surface sediment z-layer sampling total PCB concentrations represent residuals settlement on the post-dredge surface, not in-situ sediments exceeding the total PCB removal action level.

Meetings

Project coordination meetings with Boeing are scheduled to occur semi-monthly during January 2015, and project coordination meetings with Boeing and EPA are scheduled for January 19 and February 16, 2015.



Deliverables

The following deliverables have been or will be provided to EPA during January and February 2015:

- Monthly Progress Report – January 2015 by February 15, 2015; and
- Revised Pre-Final Certification Inspection Letter Report in response to EPA comments identified in their December 12, 2014 disapproval letter.

DEVIATIONS FROM AOC SCHEDULE – JANUARY AND FEBRUARY 2015

No deviations from the AOC schedule are anticipated in January and February 2015.

CLOSING

Farallon trusts that this monthly progress report provides sufficient information for EPA. If you have questions regarding this project, please contact the undersigned at (425) 295-0800.

Sincerely,

Farallon Consulting, L.L.C.

Amy Essig Desai
Principal

cc: Mr. E. Gilbert Leon Jr., EMJ (by e-mail only)
Mr. Miles Dyer, Jorgensen Forge Corporation (by e-mail only)
Messrs. William Joyce and Ian Sutton; Joyce Ziker Parkinson, PLLC (by e-mail only)
Messrs. Ryan Barth and David Templeton; Anchor QEA, LLC (by e-mail only)

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